

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CUREN ESSEX, ALICIA BULKO,
SUSAN COOK, ELIZABETH ZUBOR,
and SUSAN TERRELL,
Plaintiff,

V

CASE NO. 09-11095
HON. ARTHUR J. TARNOW

LIVINGSTON COUNTY, a municipal corporation,
ROBERT BEZOTTE in his individual capacity as
the Livingston County Sheriff, TOM CREMONTE
in his individual capacity as the Livingston County
Jail Administrator, and RANDY BOOS, in his
individual capacity, Jointly and Severally,
Defendant.

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**PLAINTIFF SUSAN TERRELL'S BRIEF IN SUPPORT
OF HER SEPTEMBER 9, 2011 SUPPLEMENT TO HER
JULY 29, 2011 AMENDED MOTION TO COMPEL DEFENDANTS
TO FILE RESONSIVE ANSWERS TO HER MARCH 7, 2011
FIRST SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS**

STATEMENT OF FACTS

The facts upon which the Plaintiff's supplement to her July 29, 2010 motion is based are set forth in the body of that supplement.

ARGUMENT AND CASES CITED

The arguments offered and the cases upon which Plaintiff's supplement is based are also set out in the body of the supplement. Those cases are:

1. National Fire Insurance Co of Hartford v Jose Trucking Corp
264 F.R.D. 233, 238 (W.D. D.C. 2010) Page 6
2. Day v Boston Edison Co
150 F.R.D. 16 (D.C. Mass 1993) Page 6
3. Kingsway Press Inc v Farrell Pub. Corp
30 F Supp 775 (S.D. PA 1939) Page 6
4. Hoffman v Wilson Line, Inc
7 F.R.D. 73 (E.D. Pa 1946) Page 6

RELIEF REQUESTED

Plaintiff Susan Terrell, through her attorneys, respectfully asked this court to enter an order directing the Defendants to file responsive answers to those of Plaintiff's March 7, 2011 Interrogatories and Request For Documents, as described in the July 29, 2011 motion and the September 9, 2011 Supplement to that motion. Plaintiff's counsel also respectfully requests that the court recommend to the trial judge that the Defendant's Motion for Summary Judgment be adjourned until the Plaintiffs have been provided with the information they have sought, and have been allowed a reasonable time to evaluate and conduct further inquiries about that information, after it has been provided.

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Respectfully submitted.
this 9th day of September 2011.

/s/ Kenneth G. McIntyre
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